

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 06-
:
v. : 18 U.S.C. §§ 1029(a)(5),
: 1029(b)(2) and 2
MOHAMAD ABDUALRAOF ABDULAAL, :
a/k/a "Moe Abdulaal" : I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE - CONSPIRACY

1. At all times relevant to this Information:

(a) defendant MOHAMAD ABDUALRAOF ABDULAAL, a/k/a "Moe Abdulaal" (hereafter "ABDULAAL"), operated a business called PC Tech, located in Fair Lawn, Bergen County, New Jersey;

(b) defendant ABDULAAL was a signatory on an account in the name of PC Tech at Columbia Savings Bank in New Jersey;

(c) PC Tech had a credit card machine (the "PC Tech Credit Card Machine") and merchant identification number (the "PC Tech Merchant ID Number") so that credit cards could be charged at that business; and

(d) the PC Tech Merchant ID Number was linked to a PC Tech bank account so credit card issuers could pay for charges

incurred on the PC Tech Credit Card Machine by depositing funds into a PC Tech bank account.

2. Beginning in or about June 2001, and continuing at all times relevant to this Information thereafter:

(a) defendant ABDULAAL, Susan H. Kim and an individual referred to herein as Coconspirator 1 ("CC-1") formed a business called Exponent Enterprises in New Jersey. The "Certificate of Formation" for Exponent Enterprises lists defendant ABDULAAL as president, CC-1 as vice president and Susan H. Kim as secretary;

(b) CC-1 and Susan H. Kim were signatories on a bank account in the name of Exponent Enterprises at Columbia Savings Bank in New Jersey (the "Exponent Bank Account");

(c) Exponent Enterprises had a credit card machine (the "Exponent Credit Card Machine") and merchant identification number (the "Exponent Merchant ID Number") so that credit cards could be charged at that business; and

(d) the Exponent Merchant ID Number was linked to the Exponent Bank Account so credit card issuers could pay for charges incurred on the Exponent Credit Card Machine by depositing funds into the Exponent Bank Account.

THE CONSPIRACY

3. Beginning sometime in or before September 1999, and continuing to in or about September 2002, in Bergen and Passaic Counties, in the District of New Jersey, and elsewhere, defendant

MOHAMAD ABDUALRAOF ABDULAAL,
a/k/a "Moe Abdulaal"

did knowingly and willfully conspire and agree with others to effect transactions, with the intent to defraud, with one or more access devices, namely credit cards, issued to other persons, to receive payment and other things of value during a one-year period, the aggregate value of which was equal to or greater than \$1,000, in a manner affecting interstate and foreign commerce, contrary to Title 18, United States Code, Section 1029(a)(5).

THE OBJECT OF THE CONSPIRACY

4. It was an object of the conspiracy to obtain more than one million dollars in money and property to which defendant ABDULAAL and his coconspirators were not entitled.

THE MANNER AND MEANS OF THE CONSPIRACY

5. It was a part of the conspiracy that, sometime prior to September 1999, defendant ABDULAAL agreed with Susan H. Kim, CC-1 and others to participate in a credit card "bust-out" scheme whereby they and others would charge credit cards in order to

obtain money and property, with no intent of reimbursing the credit card companies for those charges.

6. It was a further part of the conspiracy that, between in or about September 1999 and in or about September 2002, defendant ABDULAAL and his coconspirators used, and directed the use of, credit card machines in the names of various merchants, including PC Tech and Exponent Enterprises, to incur fraudulent charges on credit cards in the names of various coconspirators.

7. It was a further part of the conspiracy that defendant ABDULAAL and his coconspirators incurred and caused others to incur fraudulent credit card charges knowing and with the intention that the resulting debt would not be paid.

8. It was a further part of the conspiracy that those credit card charges did not pertain to any legitimate transactions at PC Tech, Exponent Enterprises or any other businesses, and instead were conducted for the sole purpose of obtaining funds from the credit card issuers for the benefit of the conspirators.

9. It was a further part of the conspiracy that defendant ABDULAAL and his coconspirators obtained money from the credit card issuers for the fraudulent charges incurred at PC Tech, Exponent Enterprises and businesses of other collusive merchants as reimbursement for the fraudulent charges.

10. It was a further part of the conspiracy that defendant ABDULAAL and others shared the proceeds of the fraudulent credit card bust-out scheme and transferred some of those proceeds out of the United States, including to Jordan and Lebanon.

11. It was a further part of the conspiracy that, in some cases, defendant ABDULAAL and his coconspirators purchased property from other merchants by using credit cards involved in the credit card bust-out scheme, with no intention of reimbursing the credit card companies for those purchases.

12. It was a further part of the conspiracy that defendant ABDULAAL and his coconspirators never paid the credit card issuers for the fraudulent charges incurred on the credit cards.

13. The credit cards used in defendant ABDULAAL's scheme were issued by various financial institutions involved in interstate commerce, including but not limited to: American Express; Fleet Bank; Citibank; Providian; Cross Country; Chase; NetBank; Bank of America; Capital One; First North American National Bank; Discover Bank; First USA Bank; Household Bank; and Sears National Bank.

14. As a result of the fraudulent scheme, defendant ABDULAAL and his coconspirators received money and other things of value during a one-year period, the aggregate value of which was equal to or greater than \$1,000.

15. Also as a result of defendant ABDULAAL's fraudulent scheme, the credit card issuers incurred a loss of more than \$1 million dollars.

OVERT ACTS

16. In furtherance of the conspiracy and to effect the object thereof, defendant ABDULAAL and his coconspirators committed and caused to be committed the following overt acts in the District of New Jersey and elsewhere:

a. In or about June 2001, defendant ABDULAAL assisted in the forming of a business called Exponent Enterprises in New Jersey.

b. On or about February 9, 2001, defendant ABDULAAL directed a wire transfer of approximately \$50,000 from New Jersey to a coconspirator in Amman, Jordan.

In violation of Title 18, United States Code, Section 1029(b)(2).

COUNT TWO - CREDIT CARD FRAUD

1. Paragraphs 1 and 2, and 4 through 15 of Count One are re-alleged and incorporated as if specifically set forth herein.

2. Beginning sometime in or before September 1999, and continuing to in or about September 2002, in Bergen and Passaic Counties, in the District of New Jersey, and elsewhere, defendant

MOHAMAD ABDUALRAOF ABDULAAL,
a/k/a "Moe Abdulaal"

did knowingly and willfully and with the intent to defraud effect transactions with one or more access devices, namely credit cards, issued to other persons, to receive payment and other things of value during a one-year period, the aggregate value of which was equal to or greater than \$1,000, in a manner affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(5) and 2.

CHRISTOPHER J. CHRISTIE
United States Attorney